

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WILLIAM D. WALLACE, Individually and	X	
On Behalf of All Others Similarly Situated,	:	
	:	
Plaintiff,	:	
	:	Civil Action No. 11-CV-8861
v.	:	
	:	
INTRALINKS HOLDINGS, INC., ANDREW	:	
DAMICO and ANTHONY PLESNER,	:	
	:	
Defendants.	X	

**LEAD PLAINTIFF’S NOTICE OF UNOPPOSED MOTION FOR (I) PRELIMINARY
APPROVAL OF SETTLEMENT; (II) APPROVAL OF THE FORM AND MANNER OF
NOTICE TO THE CLASS; AND (III) SCHEDULING OF A FINAL APPROVAL
HEARING**

PLEASE TAKE NOTICE that, Lead Plaintiff, Plumbers and Pipefitters National Pension Fund (“Lead Plaintiff”), on behalf of itself and the Class, in the above-captioned action, through counsel, hereby move this Court before the Honorable Thomas P. Griesa, for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure for: (i) preliminary approval of the proposed Settlement (ii) approval of the form and manner of notice to Class Members; (iii) the scheduling of a hearing (the “Final Approval Hearing”) on final approval of the Settlement and Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses; and (iv) such other and further relief as the Court deems just and proper. Defendants will not oppose this Motion.

Dated: New York, New York
July 31, 2015

Respectfully submitted,

**COHEN MILSTEIN SELLERS & TOLL
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CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2015, I caused the foregoing brief to be electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel.

**COHEN MILSTEIN SELLERS
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